

**UNITED STATES DISTRICT COURT
DISTRICT OF COLUMBIA**

UNITED STATES OF AMERICA

Plaintiff,

v.

MICHAEL T. FLYNN,

Defendant.

Criminal Action No. 17-232-EGS

**AMENDMENT TO MR. FLYNN’S AUGUST 30TH MOTION TO COMPEL
PRODUCTION OF *BRADY* MATERIAL AND FOR AN ORDER TO SHOW CAUSE**

Michael T. Flynn “Mr. Flynn” respectfully submits this amendment to his Motion to Compel Production of *Brady* Material and for an Order to Show Cause [“the Motion”], filed August 30, 2019 (Dkt. 111).

1. On page 4, paragraph 3 of the Motion, Mr. Flynn requests any drafts, electronic communications (“ECs”), emails, and texts related to Nellie Ohr’s research on Mr. Flynn, and all CIA cables on the topic as well.
2. On page 4, paragraph 4, Mr. Flynn additionally requests with respect to Col. (Ret.) James Baker, the current head of DOD Office of Net Assessment, production of Col. Baker’s calendar showing his meetings with or any other communications with David Ignatius from July 1, 2015 through March 2017.
3. On page 4, paragraph 8, Mr. Flynn further requests ECs in addition to human sources.
4. On page 5, paragraph 16, the date of the Russia Today dinner is incorrect. The date of the dinner was December 10, 2015, rather than December 17, 2015.

Counsel does not anticipate the government's need for additional time to respond in light of these minor amendments but does not oppose if needed.

Dated: September 23, 2019.

Respectfully submitted,

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CERTIFICATE OF SERVICE

I hereby certify that, on September 23, 2019, true and genuine copies of Mr. Flynn's Amendment to his Motion to Compel Production of *Brady* Material and for an Order to Show Cause were served via electronic mail by the Court's CM/ECF system to all counsel of record, including:

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Respectfully submitted,

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